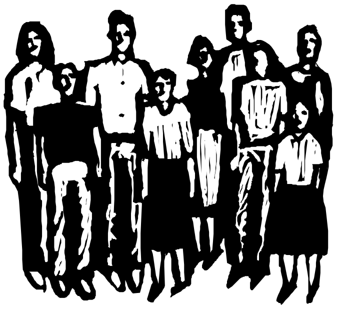
MODULE 8: BUILDING ORGANIZATIONAL SUPPORT



Effective organizational support is important to achieving long term success for your IEMS. This module will cover training, documentation, stakeholders and communication.

Training to Get the Job Done

It's very important that people receive the training needed to get work done in a way that is consistent with your objectives. Training is needed both in technical work and for general awareness on the part of all employees. The following are some examples of areas where training is needed:

- legal requirements,
- ability to recognize new problems,
- technical work needed to solve problems,
- procedures to implement operational controls,
- any new procedures or needs related to significant environmental aspects, and
- awareness of the company's environmental policy and the IEMS and its objectives

☞ Tip

Don't overlook the need for on-going training when experiencing employee turn-over. Be sure that new employees are trained soon after they arrive.

In addition to environmental or worker health and safety training that your company may currently carry out, you will have specific training requirements associated with significant environmental aspect operational controls, as your IEMS develops. Module 6 addressed the training for that phase of your

IEMS. Training plans developed during completion of that module should be integrated with the training identified in this module.

Go through the Action Steps listed below and use Worksheet 8-1 to help you identify, plan for and track the training needed to assist in developing and putting your IEMS in place. You will probably be able to identify some general training needs now, but will need to return to this module to add specific technical training needs that may be identified as you proceed with the IEMS.

Action Steps

1. Identify all job functions that affect the environment. Small companies may wish to identify individuals. Identify who is responsible for employee health and safety.

2. Identify the training and type of training these people currently receive that relates to environmental, including health and safety, concerns.

3. Determine if IEMS education could be included in this training or whether there should be special IEMS training, at least in the beginning.

4. Identify training materials or programs available outside your company. Some places to check include:

- Trade Associations
- Small Business Association
- EPA materials
- State Department of Environmental Protection
- Suppliers
- Certified Contractors

Worksheet 8-1: Training Plan

Jobs Affecting Environment	Training Needs	How to Train	When/ Length	Budget	Completion Date	Who is Responsible
Sample: Staff EH&S Person	Environmental Policy	Staff Training Session	Once/ Two hrs.	?	?	?
Production Employees	Emergency Preparedness & Response					
Contact Person:			Date Completed:			

Documenting Your Work

When undertaking a new activity like IEMS development, documenting discussions, plans, targets, and programs is crucial. Documentation ensures that no information is lost, and lets you track your performance. Much of this documentation will become the content for your company's IEMS Manual. The companion document to this guide, the *Company Manual Template*, provides a template for your own documentation development. Documentation is important to the success of your IEMS for several reasons:

Resource

Review the *Company Manual Template* for sample documentation to help you develop your own IEMS Manual.

- Word-of-mouth information is rarely communicated consistently, whereas written information is more likely to be constant from person to person and over time.
- Creating documentation helps you assess the progress of your IEMS. Some inconsistencies show up only as you commit your ideas to paper, and having a record allows you to check on progress and evaluate results.
- Documentation is vital to maintaining consistency in an IEMS over time and from department to department. In most companies, change is a fact of life: new products are developed, the company grows, employees change positions or leave the company. Accurate documentation will make it much easier to maintain an effective and flexible IEMS during these changes.

Experience has proven the value of documenting meetings, decisions, and study results, and of making that documentation accessible to those who need it.

What is Documentation?

The term “documentation” has many different interpretations. The term can refer to any or all of the following:

- instructions for doing something;
- records of what was done;
- policies developed;
- printed matter that is given or sent to clients, regulatory agencies, customers, and the public; and
- any electronic copy of the items above.

How a company interprets “documentation” will depend on its particular experience. For example, documentation could include environmental impact statements, process manuals, or even the local newspaper that reports your company’s activities. Other examples might include environmental training records and OSHA manuals. All of the work completed to develop your IEMS also provides documentation.

How to Develop Your Documentation

The basic steps in preparing IEMS documentation include:

Step 1: Determine how EMS documentation can be integrated into existing documents.

Before you dive into your documentation, learn how deep the water is. Find out what documentation already exists,

☞ Tip

Documentation is usually the single most overlooked administrative procedure in most companies, but it can play a vital role in EMS development. Determining what you need from your documents, both for future reference and to teach procedures to others, will help you understand the overall needs that you want your IEMS process to meet.

☞ Tip

Remember that you will not finish most of the modules in this Guide the first time through. You will probably overlook items that will be useful for your IEMS documentation during your first search. Simply add items as you think of them later in the process. Whoever is in charge of documentation will therefore need to plan for later additions.

what its purpose is, and whether it works. The goal of this search is to locate materials you can use to begin your EMS implementation and documentation. Many companies use the same format for all their documents. An example of existing documentation might be a quality plan or tracking reports.

Step 2: Tailor the documentation to your organization's individual needs.

You will probably have to compromise in producing documentation that meets your needs while also meeting your budget. Here are some questions to help you determine what fits your needs:

- How can you extend those documents that already exist rather than creating new ones?
- Does your business operate in a single location or many? This will affect who creates some of the documents and where they are located. It may also affect how many versions of a document might be necessary to cover different circumstances.
- What is your current computer capability? Many companies use an electronic system to maintain documents.
- What security precautions do you need? As a computer system becomes larger and can be accessed by more people, electronic information can more likely be edited

and destroyed. Security, or at least restrictions on who can change data, can be a critical issue for many companies.

Step 3: Determine a format for all documents.

Before developing your IEMS documents, plan the format (document and page appearance) for the documents to be created. If a company standard exists, use it. If not, the need for IEMS documentation provides an opportunity to create a standard company format. Consider whether pages are single- or double-sided and why; choose margins, header, footer, typefaces, text, headings, etc. Include plans for bulleted and numbered lists, tables, and even paragraph spacing. Once you have a consistent format for documents, anyone who writes one will use the established electronic format and fill in the necessary text. All documents will look like part of an organized, integrated system. Most important, documents will be it easier to read and understand!

Step 4: Prototype each document.

Prototyping means visualizing what you will need in the document and creating an outline for it before you actually have information to fill in. This practice is useful not only for document preparation, but for the IEMS process as a whole. As you visualize what you will need in the document, you will gain understanding about what you will need from the process of developing your IEMS. It’s a way of “outlining” your IEMS process as well as designing documents.

Who should do the prototyping? The best people to do this are the people who will use the document. Involving them in the process gives document users the power to develop documents they will actually use – effective documents.

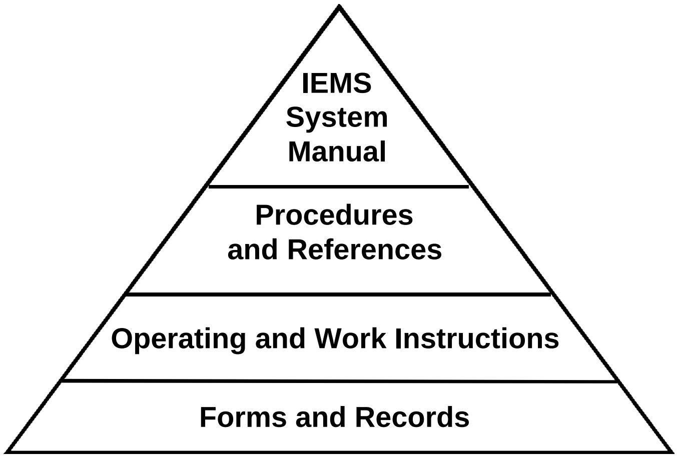
The following questions will help your “prototypers” design documents. Consider these questions for each document you identify as necessary for your company.

- What is the document’s purpose?
- Who will use it, and how will they use it?
- How long should the document be?
- What must be included in the document? Which information is most critical?
- Is it process-focused? Process focus rather than regulation- or program-focus helps people who use the documents to better understand how their jobs fit into the rest of the company functions.
- How is the information best arranged? Will the user read sequentially or randomly?

Example: A Tiered Documentation System

The tiered documentation system consists of four “levels” of documents. The system can be shown as a pyramid with the environmental management system manual at the top and records at the bottom (see Figure 8-a).

Figure 8-a. Documentation Levels


IEMS System Manual
Procedures and References
Operating and Work Instructions
Forms and Records

The pyramid shape illustrates a hierarchy in which the amount of detail, degree of specificity, and number of pages all increase as you progress from the top to the bottom of the figure.

Creating an Outline for the Process

It will be helpful at this point to develop some idea of what your IEMS documentation will look like, and thereby determine the work needed to fill it in. Doing so will help to plan the development of your IEMS. Create an outline for the process of developing your IEMS and your Company Manual or other form of documentation that suits your company. What and how much documentation you include depends upon your company's needs. The following outlines a sample Company Manual:

1. Environmental Policy
2. Environmental Action Responsibilities Assignments
3. Environmental Documents and Their Location
4. Identification of Environmental Aspects
5. Identification of Legal Requirements
6. Identification of Significant Environmental Aspects
7. Development of Objectives, Targets, and Action Plans
8. Conducting an Alternatives Evaluation
9. Development of Operational Controls
10. Environmental Training (Awareness and Task-Specific)
11. Emergency Preparedness
12. Review of New Products and Processes
13. Documentation and Document Control
14. Communication with External Stakeholders
15. Conducting a Compliance Assessment
16. Conducting an Internal Assessment
17. Taking Corrective Action
18. Management Review

The actual content of your outline will be filled in as you proceed to develop your IEMS.

Resource

Take a look at the accompanying *Company Manual Template* for sample procedures and formats to help you document important components of your IEMS.

Document Control

Documents must be easy to find and kept up to date. Consider the following points regarding your document control. Two worksheets follow this section. Worksheet 8-2 will help you develop documents and Worksheet 8-3 will help you manage your documents once they have been created.

Sound document management ensures that:

- they can be located;
- they are periodically reviewed, revised as necessary, and approved for adequacy by authorized personnel;
- the current versions of relevant documents are available at all locations where operations essential to the effective functioning of the system are performed;
- obsolete documents are promptly removed from all points of issue and points of use, or are otherwise assured against unintended use; and
- any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.

Worksheet 8-2: Documentation

List Existing Documents	**Determine Format: Who/ Date Completed**	**Develop Prototype (Content): Who/ Date Completed**	**Assign Writing: Who/ Date**	**Review Writing/ Compare to Prototype Who/ Date**	**Added to Document List/ Date**	**Who Has Access**	**Where Located**
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
List Documents to be Created							
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		
	/	/	/	/	/		

Contact Person: Date Completed:

Corresponds to CS–2 of the *Company Manual Template*.

Worksheet 8-3: Document Control

Document	Who Will Use It	Permanent Location	Periodic Review Schedule/ Who	When Can Be Destroyed
			/	
			/	
			/	
			/	
			/	

Contact Person: Date Completed:

Working with Stakeholders

Stakeholders are anyone who has a stake in your company's environmental performance. Stakeholders can play an important role in helping your company develop an IEMS. Employees have strong stakeholder interest in your company and can provide strong support for IEMS development. Customers, suppliers, and neighbors can provide useful input. In addition, establishing partnerships with trade associations, suppliers, professional associations, and community colleges can be very helpful in developing parts of your IEMS. This section addresses the kind of stakeholders you may wish to include in the process and the potential benefits of including stakeholders. While involvement of employees is critical to the success of your IEMS, how far you proceed with including additional stakeholders is your decision.

The DfE Program has found that including a variety of stakeholders in a project provides proven benefits. DfE stakeholders include: industry, government, labor, environmental groups, and others. Their inclusion ensures both a mix of viewpoints and a wealth of different experience and training that contribute to a project. This level and breadth of stakeholders may not be available to a small company, but opening your IEMS planning process to a variety of stakeholders will improve results.

Stakeholder Roles

Consider why you would want to include internal and external stakeholders and what roles they can play. Before engaging stakeholders, be clear on what you expect their role to be. What do you want from them? What do you intend to tell them? Consider the following:

- Internal stakeholder (e.g., employee) participation can facilitate implementation of environmental projects as employees "take ownership" of the IEMS process and the process changes it may bring;

- Different stakeholders bring useful perspectives to identifying environmental issues, often identifying issues that might otherwise have been overlooked;
- Participation by all types of stakeholders can add credibility, transparency and value to your IEMS;
- Involving external stakeholders can help them understand your business operating constraints;
- Sometimes being an environmental leader can gain customer recognition and loyalty, and involving customers in your IEMS helps them recognize your leadership.
- Forming partnerships with customers and suppliers can help to identify shared concerns and ways to cooperate to resolve them. There may be ways that your company can help your customers meet their environmental management needs. Forming partnerships with suppliers can help your company obtain important information and may help you meet your IEMS goals.

☞ Tip

Working together with your customers to identify common needs in managing environmental concerns can help to build long term relationships.

Identifying Stakeholders

Almost every organization will have a wide array of internal and external groups that may be interested in and helpful partners to that organization. These groups will not be homogenous. Each will have its own priorities and perspectives, and each will have something different to contribute in support of your IEMS.

The following list provides types of stakeholders:

Internal Stakeholders

- Employees
- Shareholders
- Customers
- Suppliers
- Investors & Insurers
- Trading Partners

External Stakeholders

- Neighbors
- Community
- Organizations
- Environmental Groups
- Larger Companies
- The Media
- The Public
- Local Government

You may want to start with those stakeholders who have expressed interest in your operations. If you wish additional input, you can contact the following sources in your effort to locate suitable stakeholders:

- ask your organization’s own employees, including plant/site managers and public relations personnel;
- contact local officials for suggestions;
- contact a local planning agency for suggestions;

☞ Tip

Remember, your stakeholders’ concerns may be very different from what you expect, and even less difficult to resolve than you may think. The only way to find out is to talk with them.

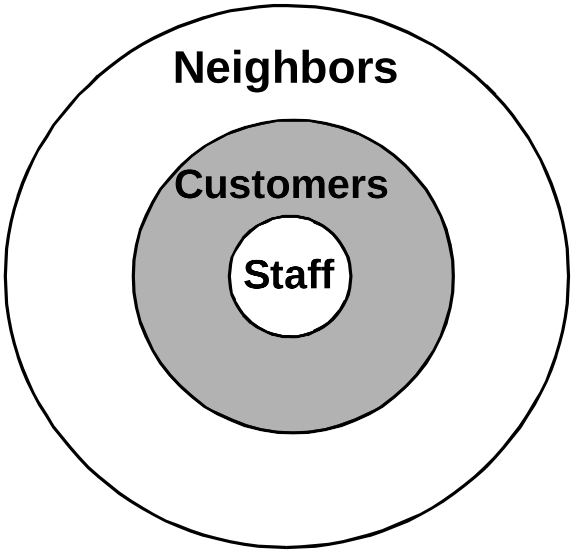
- contact local schools, community colleges, or universities; or
- contact a national advocacy group to elicit suggestions as to which local or national groups may be interested/suitable.

How to Work With Your Stakeholders

The next stage of the process is to establish dialogue with stakeholders. You may view this as an opportunity to further refine your understanding of the various interests of the groups.

Develop stakeholder participation in stages and learn as you go. You might think about the different kinds of stakeholders as forming ever broader circles around your business (see Figure 8-b). Begin with the innermost circle and work outward.

Figure 8-b. Levels of stakeholder interest



Communications

When working with either internal or external stakeholders, including your IEMS team, effective communication will facilitate a smooth implementation of your IEMS. You will want to follow these effective rules of communication:

Begin early in the process.

Let people know what you are doing. In most cases, you will need the cooperation of several people within your company to gather information and develop an IEMS that will work. In small and large organizations alike, early communication will pay off in greater acceptance of the resulting system.

Set your communication objectives.

Decide what you want to achieve in your communication. Setting this goal will help you get the right message across without overwhelming people with too much information, spending too much time, or missing the mark. It is helpful to create an IEMS communication policy for your company. The policy should outline what kinds of information will be communicated to external stakeholders, and how the company will document and respond to communications from external stakeholders. In addition, the policy should discuss how the company will report environmental health and safety (EH&S) incidents, such as spills, accidents and

☞ Tip

It's important to revisit the communication plan at various stages of your IEMS development to add any additional communication needs for each piece of your IEMS.

☞ Tip

Create and maintain a list of everyone you can think of who would be interested in your company's environmental activities. Include how you could reach them. You can then make a decision about where to begin. You could start with staff and later add other audiences if that suits your capabilities and needs. It is helpful to make your communication list as complete as possible to start with but pare it down to start out. Begin small, and then you can use the list to expand when ready.

“near misses”. The policy should include who reports what, to whom, and when.

Communicate regularly and integrate IEMS communication.

To build support for the IEMS, try to communicate on a regular basis. Some simple means of regular communication can usually be accomplished without straining resources – for example, a bulletin board posting, email messages, or articles in the organization newsletter. Don’t forget to consider direct word-of-mouth communication, particularly in smaller organizations. Talking directly with key individuals at intervals may be the best mechanism for ensuring good communication. Use existing channels of communication to get the message out on your IEMS activities.

Consider various methods of communication when informing stakeholders about your company and what you are doing, or plan to do, to protect the environment. Methods may include:

- discussion in company meetings;
- company website;
- scheduling tours of your facility;
- producing a fact sheet about your company’s activities, the EMS program, and why and how your company would like to include stakeholders;

- establishing a phone line to answer questions, record concerns, etc.;
- going to local schools, community colleges, universities, or civic organizations, such as the Rotary, that may provide a focal point of interest about your company; and
- holding public meetings when you feel it is appropriate.

Ensure that stakeholder dialogue is a two-way process. The stakeholders will want to know that their comments and concerns are being listened to and taken into account. You need to convey that your organization is genuinely and actively including them.

Worksheet 8-4 will help you develop criteria.

Worksheet 8-4:* Working with Stakeholders

Your Stakeholders	Potential Environmental Interest	What you want to tell them:	What you want them to tell you:	How to communicate with/tell them:	When	Person Responsible
(Example) Employees		Environmental policy	How to get it done	Memo, bulletin board, meetings, suggestion box, intranet		
(Example) Neighbors		Environmental policy and IEMS plans	Their environmental concerns	Meetings, open house, flyers, suggestion box, web site		
Customers		Environmental policy and IEMS plans	Their environmental concerns	Above, plus inserts in direct mail advertising, or billing, web site		
Contact Person:			Date Completed:			

*Report results on CS-01 in *Company Manual Template.*

To complete this worksheet, think about ways to use your current means of communication to begin your dialogue. Consider which methods will work to convey your message to each group, and which will work to obtain the information you want to get from each group. The means that you choose may be different for each stakeholder group.

In addition to communicating with your stakeholders, it is important to track their communication to your company and the response made to that communication. A procedure for documenting and responding to stakeholder communication should be established and a person appointed to be responsible for carrying it out. Worksheet 8-5 will assist you in setting up and documenting each communication.

The following Case Study shows how “Company B” set up a process to train and then use its internal stakeholders to identify environmental concerns and some of the benefits achieved.

☞ Tip

Make use of current technology. A company website can be used to communicate your company’s environmental policy and other important elements of your IEMS. It can also be used to solicit comments and suggestions from stakeholders.

Worksheet 8-5: Stakeholder Communication Record

Date Communication Received:	
Type of Communication:	
Received From:	
Address/Telephone Number/E-Mail:	
Content of Communication (attach copy if possible):	
Will ABC Company Respond?	Y N
Date of Response:	
Person Responding:	
Nature of Response (attach copy if possible):	
Are Internal Actions Necessary? (If Yes, fill out a Corrective Action Form.)	Y N
Contact Person:	Date Completed:

Corresponds to CS-02 of the *Company Manual Template*.

Case Study: Company B — Working With Stakeholders

Company B is a 30-person company that manufactures sangria and chile salsa. With strong senior management backing and support from a local consultant, Company B focused initially on building environmental consciousness among its employees. To all of its workers and managers the company offered general environmental awareness training as well as more specific training on how to identify specific environmental issues. Employees then split into 10 teams, each charged with identifying the environmental issues associated with a specific area of operation, from the acquisition of raw materials through to product delivery. Based on the work of these teams, Company B developed a list of its most important environmental issues and concrete objectives and plans for improvement.

The key to Company B's success lay in using participatory teams to define new environmental problems and develop solutions. For example, the company identified waste of raw materials as an environmental issue, and teams from several areas found ways of reducing waste. Company B now requires its suppliers to use stronger containers to avoid materials spoilage. More significantly, the team from the mixing area realized that by using a spray nozzle to clean out left-over orange juice concentrate (a key ingredient in sangria) from large supply containers, it can recover an additional 3,000 pounds of concentrate (6% of its total consumption, valued at $4,200) per year. Company B gained an even greater economic benefit by revising its process for cleaning and sanitizing its stainless steel tanks, reducing use of an iodine-based cleaning fluid by 11,000 liters per year, or 90%, at an estimated yearly savings of $7,000.

Other benefits the company has realized include improved compliance, a safer work environment, and reduced emissions from its transport vehicles thanks to improved maintenance. The environmental awareness of all employees has increased significantly, with some workers extending their new-found environmental consciousness to their homes. The company has also publicized its participation in the EMS project to the local community in an effort to improve its community relations and to help improve the environmental awareness of the community.